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April 19, 2017

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Martin Glenn
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (MG)**

Letter Regarding Update on Related Proceedings

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Judge Gerber’s Endorsed Order dated May 5, 2015 [ECF No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically, on April 10, 2017, Judge Furman entered a “text only” order in MDL 2543 [MDL ECF No. 3826] directing the parties to submit, by April 18, 2017:

supplemental briefs, not to exceed ten pages, addressing the following questions: (1) Whether the Court should treat the economic loss claims of the pre-2009 Delta Ignition Switch Plaintiffs asserted in the Fourth Amended Consolidated Complaint (“FACC”) as having been filed in the first instance in this District and, if so, whether the Court should (assuming federal choice-of-law law does not apply) apply the choice-of-law law of New York State to Plaintiffs’ successor liability claims, not based on the Sale Order or bankruptcy proceeding, but because this Court sits in New York, see, e.g., *Klaxon Co. v. Stentor Elec. Mfg. Co.*, 313 U.S. 487, 496 (1941); and (2) what impact, if any, a ruling by the Bankruptcy Court allowing Plaintiffs to file late proofs of claim against the GUC Trust would have on the successor liability claims.

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Attached hereto as **Exhibit “A”** and **Exhibit “B”** are, respectively, New GM’s supplemental brief (without exhibits¹) and the plaintiffs’ supplemental brief addressing Judge Furman’s questions.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

SD/hs
Encl.

¹ The exhibits to New GM’s supplemental opening brief are voluminous. If the Court would like copies of the exhibits, they can be provided.